

# **Goddard Procedural Requirements**

DIRECTIVE NO.GPR 8715.8CAPPROVED BY Signature:Original Signed ByEFFECTIVE DATE:June 17, 2019NAME:Eric K. IsaacEXPIRATION DATE:January 8, 2023TITLE:Director, Safety and Mission Assurance

# **COMPLIANCE IS MANDATORY**

**Responsible Office:** 360/Safety Division

**Title:** Fall Protection Requirements for GSFC

#### **PREFACE**

#### P.1 PURPOSE

This directive sets forth the minimum fall protection requirements within the framework of Goddard Space Flight Center's (GSFC) safety policies and constraints. It does not replace Occupational Safety and Health Administration (OSHA) regulations, National Aeronautics and Space Administration (NASA), GSFC, nor contractor safety programs requirements, except where this policy is more stringent. This policy does not attempt to repeat OSHA, but rather define GSFC's additional fall protection requirements. It is not an instruction manual for untrained personnel, nor is it a substitute for detailed procedures judged necessary for the safe conduct of a specific task involving fall hazards by qualified and competent persons.

#### P.2 APPLICABILITY

- a. This directive applies to all GSFC civil servants, as well as all contractors, grantees, and other persons at all GSFC facilities, and GSFC tenant organizations, contractors, grantees, clubs, and other persons operating on GSFC property as required by law and as directed by contractual, grant, and agreement documents.
- b. The term "Safety Office" applies equally to the safety offices at Greenbelt (Code 360) and Wallops Flight Facility (Code 803).
- c. In this directive, all document citations are assumed to be the latest version unless otherwise noted.
- d. In this directive, all mandatory actions (i.e., requirements) are denoted by statements containing the term "shall." The terms "may" or "can" denote discretionary privilege or permission; "should" denotes a good practice and is recommended but not required; "will" denotes expected outcome; and "are/is" denotes descriptive material.

#### P.3 AUTHORITIES

- a. 29 CFR 1910, OSHA, Occupational Safety and Health Standards
- b. 29 CFR 1926, OSHA, Safety and Health Regulations for Construction
- c. NPR 8715.3, NASA General Safety Program Requirements

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#### P.4 APPLICABLE DOCUMENTS AND FORMS

- a. 29 CFR 1910 Subpart D, Walking-Working Surfaces
- b. 29 CFR 1926 Subpart M, Fall Protection
- c. GPR 1400.1, Waiver Processing
- d. ANSI/ASSE Z359, Fall Protection Code series

#### P.5 CANCELLATION

GPR 8715.8A, Fall Protection Requirements for GSFC

# P.6 SAFETY

As described throughout this directive.

Any waivers to requirements listed in NPR 8715.3 and this document, shall be completed in accordance with GPR 1400.1.

# P.7 TRAINING

Training is as required by the appropriate job classification and in accordance with ANSI/ASSE Z359.2.

# P.8 RECORDS

Record Title	Record Custodian	Retention
Records of Fall Protection Training	Civil Servants: Office of Human Capital Management and/or Supervisor  On-site Contractors: Company retains records.	NRRS 3/33C – Destroy or delete 5 years after separation of employee or when no longer needed, whichever comes first.
Fall Protection and Rescue Procedures	Document Owner	NRRS 8/23.5A (10) – Destroy 5 years after issuance of a new plan or procedure

<sup>\*</sup>NRRS – NASA Records Retention Schedules (NRRS 1441.1)

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# P.9 MEASUREMENT/VERIFICATION

The Safety Office will gather metrics from the following activities and analyze them for trends and lessons learned:

- a. Audits/inspections of work at height operations to ensure organizational program compliance; and
- b. Review of close calls, lost-time incidents, personal injury, and/or property damage due to falls from greater than four feet.

# **PROCEDURES**

#### 1. ROLES AND RESPONSIBILITIES

#### 1.1 The Center Director:

a. Shall designate in writing a Center Fall Protection Program Administrator who is responsible for the development, implementation, and management of the Center's fall protection program for the Greenbelt and Wallops locations.

# 1.2 Fall Protection Program Administrator:

- a. Shall have the responsibilities as noted in ANSI Z359.2
- b. Conduct an annual review and audit of the Center's fall protection program to ensure compliance. Use of new technology, regulations, third party audits, and industry practices should be considered during the annual review and audit. Notify the GSFC community of identified lessons learned, mishaps and recalls of fall protection equipment; and
- c. Reviews and concurs/non-concurs with waivers associated with fall protection.

#### 1.3 Qualified Person:

- a. Shall have the responsibilities as noted in ANSI Z359.2
- b. Will be formally identified by the Fall Protection Program Administrator and support the program administrator, competent and authorized persons, and the fall protection program by supplying technical information and serve as a subject matter expert; and
- Will provide information to the authorized and/or competent person when selection of an appropriate non-engineered anchorage for a fall arrest or fall restraint system has not been accomplished;

# 1.4 Competent Person(s):

- a. Shall have the responsibilities as noted in ANSI Z359.2
- b. Shall ensure new facilities, processes, equipment and operations are assessed for fall hazards during the design phase and controls implemented in the order of preference based on risk;

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c. Shall ensure fall hazard assessments have been completed for all tasks exposing personnel to falls from heights and adequate controls based on risk have been identified

- d. Will be identified, in writing, by their respective employer, and be responsible for the immediate application of fall protection work where fall protection is required;
- e. Should have work experience related to the application of fall protection;
- f. Should be a resource to authorized persons for fall protection issues; and
- g. Should assist authorized persons when requested to ensure that non-engineered anchorages selected are acceptable, fall protection system(s) will work as intended, fall protection equipment is inspected prior to use, fall protection systems are used in accordance with manufacturer recommendations, OSHA requirements, qualified person designs, and local policy, and rescue plans are in effect; and

**Note:** Non-engineered anchorages can be selected by a competent person, providing the competent person can predict the arresting force and the total required clearance of the system.

# **1.5** Authorized Person(s) (User):

- a. Shall have the responsibilities as noted in ANSI Z359.2
- b. Shall inspect, install, use, maintain, store, and dismantle fall protection equipment according to OSHA, ANSI, NASA, and/or manufacturer requirements; and
- c. Will notify a competent person for determination of the appropriate action to be taken when conducting any work where required fall protection is not in place, fall protection equipment has been found defective or been subject to a fall, or the performance of the fall protection system is unpredictable.

# 1.6 Supervisors, Employers, or Program/Project Manager:

- a. Shall have the responsibilities as noted in ANSI Z359.2 (as defined as employers)
- b. Shall ensure that anyone who has been identified as a qualified person by the fall protection administrator has been trained in accordance with ANSI Z359 series documents;
- c. Shall ensure that employees who may work near heights have the appropriate awareness training to recognize such hazards associated with working at heights: and
- d. Shall ensure that GSFC fall protection requirements are included in work instructions where employees and/or contractors will be working in situations that require fall protection and ensure that a competent person is assigned responsibility for the application of fall protection where required.

#### 2. FALL HAZARD CONTROLS

The following controls, in order of preference, shall be used when determining controls to a fall hazard:

- 1. Hazard Elimination;
- 2. Guarding;
- 3. Fall Restraint;
- 4. Fall Arrest;

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5. Administrative Controls: (Administrative controls must be approved by a qualified person or the Fall Protection Administrator)

Note: Be cautious when using guardrails or chains as a means of passive fall protection. Such mechanisms may be subject to failure due to wear and tear and/or faulty design, construction, installation, and testing. Leaning against guardrails, gates, or chains, defeats the purpose of the protection afforded by of them and is frowned upon.

#### 3. FALL HAZARDS AND ASSESSMENTS

a. Fall protection requirements shall be identified by the competent person, supervisor, or program/project manager for Walking/Working Surfaces with unprotected edge/opening or other fall potential of 4 feet or greater for general and flight project work and 6 feet or greater for construction work.

**Note**: There may be differing heights within other national consensus standards as to when fall protection is required. The competent person or fall protection administrator should be consulted for other applicability of these standards.

- b. Projects/Contractors working at GSFC shall develop a Fall Protection Plan (FPP) that will address project specific fall hazards that will be encountered while working at heights. This FPP (see Appendix C for a sample plan) will become a part of the project/contractor's overall Safety and Health Plan, which addresses the approach to implementing the requirements of this GPR and all applicable OSHA regulations. This FPP will be available when requested by the fall protection administrator;
- c. Over/near water operations: If employees are required to work over/near water they shall be protected from falling as required by this policy and 29 CFR 1926 requirements. This section applies to construction activities, and is not intended to apply to marine operations that are governed by 29 CFR 1917, Subpart B, Marine Terminal Operations; and
- d. Fall hazards from any height to lower level shall require protection if the work is over a collateral hazard (e.g. moving machinery, chemicals, electrical hazards, impalement hazards).

# 4. FALL PROTECTION SYSTEMS

- a. Users of any fall protection system shall only use systems designed to meet the requirements set forth in the applicable OSHA subpart(s) and ANSI Z359 series standards, except where deemed inappropriate by a qualified person and the fall protection administrator;
- b. Fall arrest system subjected to impact loading shall be immediately removed from service, and returned to the manufacturer for repair or for destruction. Marking of any fall protection

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webbing is not recommended unless approved by a qualified person or the fall protection administrator;

- c. When using a Work Positioning System it shall:
  - (1) Be used in conjunction with an independently anchored fall protection system.
  - (2) Not permit a free fall of greater than 2 feet.
- d. If anchor points are being installed for workers other than the installer, a procedure shall be provided to ensure that the authorized user can determine that the system is approved for use. Acceptable anchorage structures may be I-beams, columns, tower legs, stairwell support structure, or other structure that is capable of holding 5,000 pounds per person or designed by a qualified person with a safety factor of greater than or equal to 2; and
- e. If the anchorage is questionable, the system shall not be used and a competent or qualified person should be notified. Handrails are not considered anchor points.
- f. Horizontal/vertical life lines: Commercially available ANSI compliant temporary horizontal /vertical life lines shall be installed per manufacturer's written instructions. Only a qualified person may modify the manufacturer requirements, and such modification being documented and sent to the fall protection administrator prior to use;

# 5. FALL PROTECTION EQUIPMENT

- Users of fall protection equipment shall only use equipment that meets or exceeds OSHA and ANSI Fall Protection Standards. All new fall protection equipment should meet ANSI Z359 series documents, current at the time of purchase, unless approved by the fall protection administrator;
- b. Shall only be used in accordance with the manufacturer instructions. Only a qualified person may change the instructions, and those changes are documented prior to use and maintained until the equipment is removed from service;
- c. Shall be inspected in accordance with manufacturers recommendations; at a minimum pre- and post-use by the authorized user and in accordance with the manufacturer specifications, but not less frequent than annually by a competent person;
- d. Shall be taken out of service when the maximum lifetime for any component as set by the manufacturer is reached;
- e. Any equipment used for fall protection shall be withdrawn from use upon notification of a safety defect, alert, or concern;
- f. Shall be used as designed and under no circumstances used to hoist tools or other work; and
- g. Equipment not designed for fall protection use shall not be used without prior documented approval of a qualified person, and be labeled "For Fall Protection Use Only."

# 6. MOBILE AERIAL PLATFORMS

Work conducted using equipment with horizontal and vertical movement (i.e. bucket type lifts) shall comply with the following:

a. Active Fall Protection shall be used in accordance with manufacturer instructions for all ANSI/SIA A92.2 Vehicle-Mounted Elevating and Rotating Aerial Devices, ANSI/SIA A92.5

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Boom-Supported Elevating Work Platforms, or any other equipment where hazards have not been guarded or as required by manufacturer operating procedures. Fall restraint is the preferred method of fall protection for use in these types of aerial platforms and should be used when feasible; and

- b. When Fall Restraint is not appropriate for the lift (e.g., manufacturer provided anchor point does not prevent a fall of any distance) or the task (e.g., transitioning from an aerial platform to another structure), a PFAS system must be used in accordance with the manufacturer specifications. In addition, worker must ensure the following conditions do not exist in the event of a fall:
  - (1) Selected PFAS does not allow worker to strike the next level, surrounding structures, or present swing hazard to worker;
  - (2) No sharp edges, burrs, or other conditions are present that could damage lanyard or other fall protection equipment resulting in a failure.
  - (3) Aerial lift or equipment and anchor are capable of sustaining the arresting force of the worker and PFAS selected.

If employees are required to exit the work platform while at height, they shall have 100% tie off. Most manufacturers require that the employee transition through the access gate or a ladder tied off to a permanent structure.

#### 7. SCISSOR LIFTS

Personal/Active fall protection is not required while operating ANSI/SIA A92.3 and A92.6 "Manually and Self Propelled Elevated Work Platforms" (i.e. scissor lifts) that have vertical-only movement capability, and equipped with OSHA-compliant guardrails unless:

- (1) The lift manufacturer has provided a certified anchor point and requires the use of personal/active fall protection, or
- (2) The lift is not being used as intended, such as climbing on the handrails, or leaving the platform while it is elevated.

If employees are required to exit the work platform while at any height, they shall have 100% tie off. Most manufacturers require that the employee transition through the access gate or a ladder tied off to a permanent structure.

Positive fall restraint protection in accordance with the manufacturer instructions must be afforded for exempted equipment listed above when guard rails are removed.

#### 8. LADDERS

- a. For fixed ladders, appropriate personal fall protection equipment shall be used when ladder is equipped with a ladder safety system, or for ladders that extend more than 24 feet above a lower level;
- b. Shall be constructed in accordance with 29CFR1910;

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c. Portable Ladders: Personal/Active fall protection equipment is not required while using portable ladders on a level surface. However, ladders do have the potential of being placed by an unprotected edge (example, person transitioning above guard rails), thus requiring the use of active fall protection while utilizing a ladder. Personnel using portable ladders should maintain proper body positioning while on the ladder, and if the ladder cannot be secured should employ the use of a second person to shore the base of the ladder; and

d. Shall be setup, used, and maintained in accordance with manufacturer operating instructions.

#### 9. SCAFFOLDING:

- a. Shall be erected in accordance with OSHA and manufacturer requirements;
- b. Shall be inspected and approved by a person trained to the level of competent person for scaffolding during erection and dismantling to determine if fall protection systems (guardrails, fall arrest, fall restraint) can be used. Any modifications to an erected scaffold will require the approval of a scaffolding competent person;
- c. Shall only be used by trained personal; and
- d. If fall protection systems are not feasible, a fall protection plan in the use of scaffolding may be developed by a qualified person and shall be approved by the fall protection administrator.

**NOTE:** A scaffolding-competent person is not the same as a fall protection-competent person.

# 10. FLIGHT PROJECT REQUIREMENTS

Flight hardware development and integration activities will comply with OSHA General Industry fall protection requirements and controls. Where scaffolding is used, fall protection is required at four feet or greater.

#### 11. WEATHER

Weather conditions should be reviewed prior to the start of outdoor work at heights and continuously monitored until the work is complete. The employer's competent person shall define unacceptable adverse weather conditions and cease work immediately if they occur. High wind conditions will be defined by the employer's competent person or by the manufacturer of equipment being used (whichever is most stringent).

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# **Appendix A – Definitions**

Most of the terms used in this directive are defined in OSHA (1910 and 1926) and/or ANSI Z359.0. Those that are critical and/or unique to this document are listed below.

- **A.1** Certification The process to determine that criteria established by a designated standard has been met, and the documentation that records that the criteria was met. The process includes testing and is performed under the supervision of a qualified trainer or entity.
- **A.2 Drop Line** A vertical line from a fixed anchorage, independent of the work surface, to which the lanyard is affixed.
- **A.3** Fall Arrest System A system designed to stop one or more persons from striking a lower level or obstructions if a fall occurs. Fall Arrest Systems are usually composed of a Full Body Harness, a Connecting Means, a suitable Anchorage, planned rescue procedures, and proper training of all users.
- **A.4 Fall Protection Plan** A plan prepared by a qualified person, developed specifically for the site where work at heights is performed. The Fall Protection Plan must be maintained up to date and should resemble the requirements of Z359 series documents.
- **A.5** Fall Protection Program Policy and guidelines established by an organization to protect all employees engaged in work activities exposing them to potential falls from elevation. The program covers all company facilities, jobsites, and employees of that company. The Fall Protection Program is used to develop the site-specific fall protection plan for individual jobsites.
- **A.6** Flight Project Activities Activities that involve the development or integration of flight hardware to overall payload or test equipment.
- **A.7 Floor Opening** An opening measuring 12 inches or more in its least dimension in any floor, platform, pavement, or yard through which persons may fall.
- **A.8 Guarding** Physical barriers between the worker and the fall hazard established so a barrier prevents the worker from falling (i.e., guardrails, vertical netting, covers, etc.).
- **A.9 High Winds** Winds with a sustained speed of 20 miles per hour or greater.
- **A.10** Institutional Activities Routine work on items that are secured to the actual facility or are used to directly support the facility such as HVAC equipment, vacuum chambers, overhead cranes, etc.
- **A.11 Mobile Aerial Platforms** Equipment with the capability to move horizontally and vertically while elevated. Examples include articulating boom lifts and bucket trucks.
- **A.12** Non-Engineered Anchorage An anchor point for which no engineering calculations have been performed.
- **A.13** Non-roof Work Preventive maintenance (PM), repair of equipment on roofs such as heating, ventilation, and air conditioning, (HVAC), lightning protection systems, rigging of fall protection systems, etc.
- **A.14 Positive Fall Protection** Fall protection by the use of a guardrail system or personal fall protection to include harness with a fall arrest/restraint system or the use of other means such as vehicle mounted platforms and/or scaffolding.
- **A.15 Scissor Lift** Mobile scaffolding that can is either manual or powered, which has vertical-only capabilities. Powered scissor lifts may have minor horizontal adjustment.
- **A.16** Steep Roof A roof having a slope greater than 4:12 (vertical to horizontal).

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- **A.17 Tower** Free-standing or guy-supported structure that is essentially vertical with access via vertical ladder or ships ladder; used to support antennas, boresite instruments, weather instruments, cameras, radars, lightning protection systems for protection of launch complexes, etc.
- **A.18 Tower Climber** Employee trained and certified as a Tower Climber and who, by possession of formal training certificate from an industry recognized trainer, training center, or an equivalent ANSI/OSHA training program, has successfully demonstrated extensive knowledge and experience to perform tower climbs.

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# Appendix B - Acronyms

ANSI American National Standards Institute

**CFR** Code of Federal Regulations

**FPP** Fall Protection Plan

GPR Goddard Procedural Requirement
GSFC Goddard Space Flight Center
NPR NASA Procedural Requirement
NRRS NASA Records Retention Schedules

**OSHA** Occupational Safety and Health Administration

PFAS Personal Fall Arrest System SIA Scaffold Industry Association

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# Appendix C – SAMPLE FALL PROTECTION PLAN

# 1. General COMPANY/PROJECT NAME shall identify and mitigate all work related fall hazards and has established methods to protect the employees from those fall hazards. b. Fall protection is required at all times within fifteen (15) feet of an unprotected edge with a fall hazard of four (4) feet or more. Where required, body harnesses meeting OSHA and ANSI requirements shall be used. COMPANY/PROJECT NAME\_ \_ will have a fall protection program c. administrator, name a competent person(s) (fall protection), and use a qualified person (fall protection) as required by the applicable NASA regulations and OSHA Standards. On this project, these designated persons are: (1) Fall Protection Program Administrator: **EMPLOYEE NAME** (2) Fall Protection Competent Person: **EMPLOYEE NAME** (3) Fall Protection Qualified Person: **EMPLOYEE NAME** d. The Fall Protection Program Administrator shall identify the competent and qualified persons listed above. 2. Training

- a. All employees working at elevations shall receive training in recognition of fall hazards, hazard mitigation, and the proper use and inspection of fall protection equipment from a competent person (fall protection).
- b. The employee training described above shall be certified in writing by the employer.
- c. The latest certification documentation shall be maintained by the employer and include the name of the employee, the date of the training, areas trained and the signature of the training instructor and/or the employer.
- d. The designated competent person (fall protection) conducting training shall be qualified in the following areas:
  - (1) The nature of fall hazards in the work area.
  - (2) The correct procedures for installing, inspecting, and disassembling fall protection systems.

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- (3) The use and operation of fall protection systems to be used.
- (4) Each employee's role in the safety monitoring system, if this system is to be used.
- (5) The limitations on the use of mechanical equipment on low-slope roofing jobs.
- (6) The correct procedures for the handling and storage of equipment and materials and installation of overhead protection.
- (7) Each employee's role in the fall protection plan.
- (8) The OSHA fall protection standard.
- e. If <u>COMPANY NAME</u> verifies and accepts training provided by another employer, the certification shall indicate the date <u>COMPANY NAME</u> determined the prior training was adequate rather than the date the training was performed.

# 3. Retraining of Employees

- a. Employees suspected of not having the understanding or skills required shall be retrained.
- b. Other circumstances that require retraining include:
  - (1) Changes in the workplace that make earlier training obsolete.
  - (2) Changes in the types of fall protection systems used.
  - (3) Observed inadequacies in an employee's use or understanding of fall protection systems.

### 4. Fall Protection Equipment

- a. Fall protection equipment shall meet all OSHA, applicable ANSI, and manufacturer requirements for use, and be properly stored when not in use.
- b. All fall protection equipment shall be inspected by the user before each use and by a competent person (fall protection) annually in accordance with applicable regulatory standards or per manufacturer's recommendations, whichever is more stringent.
- c. Annual inspections of fall protection equipment shall be documented and meet the following criteria:
  - (1) All fall protective equipment to include safety harnesses, drop lines, lifelines, fall arrest, as well as positioning lanyards, ladder safety climb, and rigid rail sleeves (e.g., Skate's, Rope Grabs) shall be inspected.

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- (2) Self-retracting lanyards shall be visually inspected and checked according to the manufacturer's recommendations to ensure there are no obvious signs of damage due to wear and tear.
- (3) All equipment shall have a manufacturer's serial number on it (e.g., tag, webbing) or it will be serialized by using a method not destructive to the equipment.
- (4) Maintenance servicing must only be completed by the manufacturer's approved service technician, trained to repair and service their equipment.
- d. A documented equipment tracking system that uses the method identified from 4.c (3) above shall be used.
- e. Any fall protection equipment that is missing an inspection tag or is past due for annual inspection shall be immediately removed from service.

#### 5. List of Attachments

- a. List of identified fall hazards.
- b. List of all protection methods to be used to protect employees from the identified fall hazards.
- c. List of controls, limitations, constraints, and procedures to be used with the fall protection methods.
- d. List of employees trained and authorized to work in areas where fall protection is required.
- e. Written certification of fall protection training for each employee.
- f. A signature page where every employee authorized to work under the plan signs to indicate that they have read and understood the plan.

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# **CHANGE HISTORY LOG**

Revision	Effective Date	Description of Changes
Baseline	08/01/2011	Initial Release
-	11/04/2011	Administrative Change to delete Physical Reports from P.8 Section.
A	02/23/2015	Changed: Authorized user refresher training to every 2 years, use of fall protection in scissor lifts only when the manufacturer requires it, separated mobile aerial platform and scissor lift sections for clarity, low slope roof work without fall protection changes from 6 feet from the edge to 15 feet.
В	01/08/2018	Updated document to reflect new OSHA requirements for Walking/Working surfaces, and to reference ANSI requirements
С	06/17/2019	Administrative Revision:  Removing the training bullet under Authorized User (1.5b), it's already stated in P.7, Training, just with different wording. Removing this bullet eliminates confusion by the reader.  Moving Horizontal/Vertical Life Lines Paragraph (3.c) to Section 4.f, as these are systems not hazards.